

**DEFENDANTS' APPENDIX 1****Non-exhaustive list of Plaintiffs' prior damages, allegations, and injuries raised by Plaintiffs *only* against Fox Defendants in the Fox News Complaint (Def. Ex. P) before any statement was made by Lindell at issue here.**

"[Fox Defendants] cast themselves as heroes in a story about a villainous foreign company that had stolen the election from President Trump." Def. Ex. P, Fox Compl. ¶466; *but see* CITE OUR OPPO ABOUT "MAIN VILLAIN".

"Client contracts that were awarded prior to the 2020 U.S.election or that were otherwise considered close to finalized have been jeopardized, forcing Smartmatic to reallocate its sales team to protect existing business instead of seeking out new opportunities. And nearly all strategic partners, from financing sources to technology partners, have begun reevaluating their relationships with Smartmatic." *Id.* ¶470.

\$700,000 for increased physical security due to Plaintiffs' employees receiving threats. *Id.* ¶¶ 469, 483-4, 510.

"For the five-year period ending December 31, 2025, the Smartmatic election technology business line forecasts over \$500 million in lost profits under base contracts alone as a result of Defendants' disinformation campaign. This does not include the profits that Smartmatic would have enjoyed from add-ons or other services that almost always accompany such base contracts, which Smartmatic estimates as not less than \$190 million. Smartmatic's election technology business enterprise value has likewise suffered, with its election-related brand, reputation, and enterprise value losing over \$2.4 billion as a result of the disinformation campaign. In total, the entire SGO Corporation enterprise value...has been damaged by not less than \$2.7 billion. *Id.* ¶ 471.

Campaign from Fox Defendants beginning November 2020 about Smartmatic and SGO Corporation that led to uptick in "Google Trends" searches of 100x increase. *Id.* ¶¶ 478-479.

\$75.9 million damages “increased expenses and lost productivity” due to Fox Defendants’ defamation and disparagement. *Id.* ¶509.

Rehabilitation of destroyed reputation from Fox Defendants for at least \$48 million additional public relations expenses through 2025. *Id.* ¶513.

Fox Defendants “disinformation campaign [before Lindell made a single statement at issue here] destroyed SGO Corporation’s enterprise value.” *Id.*, pt. (V)(D) at p. 237.

Smartmatic destroyed after aggressively pursuing election-related opportunities in the United States, with enterprise value a “fraction” of what it was “as a result of [Fox Defendants] disinformation campaign.” *Id.* ¶¶516 – 517.

Value of Smartmatic’s intellectual property and tangible assets “has been nearly destroyed... leaving little value beyond liquidation value of [Plaintiffs’] tangible assets.” *Id.* ¶ 518.

Relief requested for “[a]ctual, consequential and special damages in an amount ...no less than \$ 2.7 billion.” *Id.* ¶754(b).